

THE HARMAN FIRM, LLP

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February 20, 2020

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*The appl'n to adjourn the status
conf. set for March 13, 2020, 10⁰⁰ am,
is denied. All aspects of the case
can then be discussed.*

2-24-2020
Alv K. Hellerstein

Re: Xiamin Zeng a/k/a Aimee Zane v. New York City Housing Authority, 18 CV 12008

Dear Judge Hellerstein:

The parties respectfully submit this joint letter to request a 60-day extension of fact discovery, which is currently set to conclude on February 28, 2020, to adjourn the March 13, 2020 status conference, and to refer this case to Magistrate Judge Cott for a settlement conference.

The parties anticipate that they will be unable to complete fact discovery by its presently scheduled conclusion, as there are several outstanding depositions, and Plaintiff's counsel, Walker G. Harman, Jr., has been out of the country, and Defendant's counsel, Jane Lippman, will soon be periodically absent to care for an ill family member. The new deadline for the conclusion of fact discovery would be April 28, 2020. This is the parties' first request to extend fact discovery. There is a status conference scheduled before the Court on March 13, 2020, at 10:00 a.m.

We also respectfully request that the Court refer the parties to Magistrate Judge Cott for a settlement conference before the Court for the purposes of coming to a settlement agreement before the parties conclude discovery. The parties have discussed settlement and are now closer in terms of a settlement amount. The parties therefore believe that a settlement is possible under the facilitation of Magistrate Judge Cott, and respectfully request that the current status conference, set for March 13, 2020, be adjourned to another date and time after the parties have attended a settlement conference, in the event that the case does not result in a settlement.

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Thank you for Your Honor's time and attention to this matter.

Respectfully submitted,

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cc: All Counsel of Record (via ECF)